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BY ECF

Hon. Gabriel W. Gorenstein
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *In re: New York City Policing During Summer 2020 Demonstrations*
No. 20-CV-8924 (CM) (GWG)
This Motion Relates to All Cases

Your Honor:

I write in reply to Assistant Corporation Counsel Amy Robinson's letter of April 28, 2022 (Dkt. 519), concerning plaintiffs' application to extend the deposition of Chief Gerard Dowling (Dkt. 492), and specifically to her statement that "plaintiffs agreed to two-day depositions for certain deponents."

The referenced "certain deponents" were witnesses whom plaintiffs had noticed for deposition, and whom defendants had also designated as witnesses in response to Rule 30(b)(6) notices served upon them. When it became clear that certain individuals would be appearing in two capacities at two different depositions, it also became clear that two days should be set aside for those depositions ("For purposes of this durational limit, the deposition of each person designated under Rule 30(b)(6) should be considered a separate deposition." Committee Notes to 2000 Amendments to Fed. R. Civ. P. 30). There was never any discussion between the parties that would preclude plaintiffs from seeking more time to depose any witness or defendant.

Respectfully submitted,

s/

Michael L. Spiegel